

## **APPENDIX G**

### **PUBLIC COMMENTS**

This appendix contains scanned copies of the letters received during the public review period (18 May to 2 July 2001) for the Public Review Draft of the MCB and MCAS Camp Pendleton Integrated Natural Resources Management Plan and responses to those comments. Copies of the Public Review Draft INRMP were placed at libraries in the local communities surrounding the Base and on the Base's website during the review period. Comments were received from 6 individuals or organizations. Opportunities for additional public comment are identified in Section 1.2.1 of this INRMP. Please note that letters from reviewers may have references to sections within the Public Review Draft of the document that were moved or deleted during preparation of the October 2001 document.

Following the letters from reviewers are Camp Pendleton's responses to the comments. The reader should refer to the list of Acronyms and Abbreviations for terms that are not spelled out within the responses.

<b>Reference Number for Letter <sup>1</sup></b>	<b>Reviewer</b>
1	Rebecca Lent, Regional Administrator, U.S. Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries, Service
2	Valarie McFall, Senior Environmental Analyst, Transportation Corridor Agencies
3	Andrew E. Wetzler, Senior Project Attorney, Natural Resources Defense Council
4	Michael W. Klein, Sr., Principal/Biologist, Klein-Edwards Professional Services
5	Michael M. Tope, District Superintendent, State of California, The Resources Agency, Department of Parks and Recreation (first letter)
6	Michael M. Tope, District Superintendent, State of California, The Resources Agency, Department of Parks and Recreation (second letter)

<sup>1</sup> In chronological order according to date received.

[This Page Intentionally Left Blank.]



UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
Southwest Region  
501 West Ocean Boulevard, Suite 4200  
Long Beach, California 90802-4213

1

JUN 15 2001

F/SWR3:FR

Commanding General (AC/S Environmental Security)  
Attention: Ken Quigley  
P.O. Box 555008  
Marine Corps Base  
Camp Pendleton, California 92055-5008

Dear Mr. Quigley,

This letter responds to your May 23, 2001 letter requesting comment on your Draft Final Integrated Natural Resources Management Plan (INRMP). The combined Marine Corps Base and Marine Corps Air Station Camp Pendleton Integrated Natural Resource Management Plan is being prepared in accordance with the Sikes Act (16 U.S.C. 1670 et seq). The purpose of the plan is to ensure that natural resource management at Camp Pendleton provides sustained support for the military mission, conservation and rehabilitation of natural resources and, subject to safety requirements and military security, public access to facilitate that use. In light of the proposed extension of the Southern California steelhead ESU to include San Mateo Creek, the National Marine Fisheries Service (NMFS) appreciates the opportunity to provide feedback on the draft plan, and thus offers the following comments concerning both general resource management and specific base operations that may affect steelhead.

Agricultural Leases

- Erosion and pesticide drainage from agricultural operations could lower water quality and adversely affect migrating steelhead. A surface monitoring station should be included within the lower San Mateo Creek watershed, similar to the program implemented in the Santa Margarita River watershed.
- NMFS recommends further analysis regarding the relationship between groundwater pumping activities within the San Mateo watershed and resulting effects on surface flow within San Mateo Creek.
- The stream crossing adjacent to agricultural lands in lower San Mateo Creek could be a migration impediment to upstream migrating steelhead. This crossing should be analyzed for proper fish passage and modified or removed if passage is found to be compromised.

A

B

C



### Training and base operations

- Training maneuvers within the San Mateo watershed need further clarification regarding possible effects to steelhead. Soil erosion in the San Mateo watershed arising from fire, projectile detonation, and road failure should be quantified, monitored, and managed within the Soil Erosion Field Inventory program. Erosion and sediment transport modeling may assist in locating problem areas within the watershed.

D

### General Comments

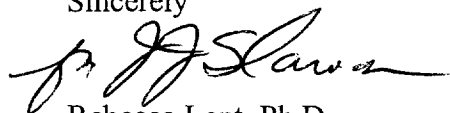
- NMFS recommends that Camp Pendleton work cooperatively with the US Forest Service (Cleveland National Forest) in implementing a program removing exotic species within the San Mateo watershed. Non-native species sampled in San Mateo Creek and known to prey on juvenile steelhead include largemouth bass (*Micropterus salmoides*), green sunfish (*Lepomis cyanellus*), bullhead catfish (family Ictaluridae), and bullfrog (*Rana catesbeiana*). Special consideration should be given to identifying the mechanisms of exotic species input into the system and strategies to prevent continued infestation.
- A watershed management plan, similar to that proposed for the Santa Margarita watershed, should be implemented. The plan should develop and implement a long-term monitoring program to measure and correlate flow, sediment transport, water chemistry, and steelhead habitat within the San Mateo Creek watershed. Cooperation with the USFS would integrate the upper and lower portion of the San Mateo drainage, leading to a better understanding of the complex processes occurring within the entire watershed.

E

F

NMFS hopes these comments prove helpful in the drafting of your Final Integrated Natural Resources Management Plan. Rick Rogers (562-980-4199) is the lead biologist on this project. Please feel free to call him if you have any questions or concerns.

Sincerely



Rebecca Lent, Ph.D.  
Regional Administrator



**TRANSPORTATION CORRIDOR AGENCIES**

June 27, 2001

2

Commanding General (AC/S Environmental Security)  
Attn: Ken Quigley  
Box 555008  
Marine Corps Base  
Camp Pendleton, CA 92055-5008

Reference: Transportation Corridor Agencies Letter of Comment on the  
Draft Final Integrated Natural Resource Management Plan

Dear Mr. Quigley:

The Transportation Corridor Agencies (TCA) wishes to thank you for the opportunity to review and comment on the Draft Final Integrated Natural Resource Management Plan prepared by Camp Pendleton. The TCA offers the following comments regarding potential effects to the proposed South Orange County Transportation Infrastructure Improvement Project (SOCTIIP):

**Chapter 2**

- Page 2-24 The second to last paragraph states that the San Mateo Creek (and others) offers the best connection for wildlife beaches, "albeit highly restricted by the Interstate 5 (I-5) corridor." The TCA does not agree with this statement. The TCA believes that the I-5 at San Mateo Creek offers very good opportunities for wildlife movement. **A**
- Page 2-25 The fourth paragraph states that electric transmission lines have increasingly constrained wildlife movement on base. The TCA does not agree with this statement. Transmission lines can actually facilitate movement by providing cleared areas of brush (access roads) in which the animals can easily travel along ridgelines. **B**
- Page 2-26 The second paragraph from the bottom of the page mentions the Upland Ecosystem Conservation Plan in Appendix J. Appendix J on the web site was not available. Upon publication of this document, TCA would like to receive a copy. **C**
- Page 2-44 Fish surveys were conducted for the SOCTIIP in 1995. Page 4-107 of the Final NES (January 1998) documented 137 gobies in the San Mateo Lagoon. The table should be updated to reflect this number. **D**

**Chapter 3**

- Page 3-4 The TCA would like to clarify that the proposed alignment, which would traverse through a portion of Camp Pendleton has been a part of the Master Plan of **E**

Walter D. Kreutzen, Chief Executive Officer

Arterial Highways (MPAH) since its amendment in 1981. This amendment came after years of studies beginning with the Southeast Orange County Circulation Study (SEOCCS) in 1976 and ending with the Environmental Impact Report (EIR) 123 in 1981. Environmental Impact Report 123 evaluated the need, feasibility, and general route of the FTC. The sentences from "One such example..." to the end of the paragraph should be deleted from the draft Final INRMP.

E  
(cont.)

## Chapter 6

Page 6-21 The TCA would like to receive a copy of the three studies referenced for the steelhead trout, snowy plover and Pacific pocket mouse.

F

Page 6-23 See statement for Page 6-21.

G

## Chapter 7

Page 7-3 The TCA would like to request a copy of the Camp Pendleton Environmental Guidebook.

H

Page 7-12 The TCA would like to request a copy of the base special training map, natural resources map and environmental constraints map.

I

Page 7-20 There are some errors in INRMP's discussion on the Migratory Species Act. There are four exceptions listed, which are incorrect. Most importantly, the California gnatcatcher is not listed as one of the exceptions.

J

Page 7-21 Please provide the TCA a copy of the Uplands Biological Assessment.

K

Page 7-24 The INRMP specifies that a physical separation of 500 feet be established between construction and active nests. Typical restrictions for uplands are prohibiting the taking or disturbing of nests during the breeding season. The TCA would like to see the INRMP revised to reflect these typical restrictions.

L

Should you have any questions regarding this letter, please contact me at (949) 754-3483.

Sincerely,



Valarie McFall  
Senior Environmental Analyst

cc: Macie Cleary-Milan, TCA  
Pete Ciesla, TCA



NATURAL RESOURCES DEFENSE COUNCIL

July 2, 2001

Commanding General  
United States Marine Corps  
Attn: Ken Quigley  
Box 555088  
Marine Corps Base  
Camp Pendleton, CA 92055-5008

Dear Mr. Quigley:

On behalf of the Natural Resources Defense Council ("NRDC"), and our over 500,000 members, we submit these comments on the Final Draft of the Integrated Natural Resources Management Plan for Marine Corps Base and Marine Corps Air Station Camp Pendleton ("Draft INRMP").

Overall, the Draft INRMP is rife with vague language and platitudes. At almost every turn the Draft INRMP fails to provide the public with any meaningful or substantive commitments that are likely to result in concrete, measurable, conservation benefits. Indeed, the vagueness of the Draft INRMP's language is so egregious that it renders truly substantive public comment difficult. Nonetheless, several specific criticisms of the Draft INRMP can be made. In particular, the Draft INRMP:

- Does not clearly describe the lines of authority responsible for managing Camp Pendleton's biological resources;
- Does not provide sufficient assurances that appropriate steps will be taken to avoid impacts to endangered and threatened species located on the base; and
- Does not provide for adequate or meaningful public participation.

For these reasons, we believe that the Draft INRMP falls far short of providing meaningful protection for Camp Pendleton's natural resources, or even manages to meet the relatively modest requirements of federal law.

# **I. The Pendleton INRMP Fails to Provide Clear Lines of Authority Responsible For Managing the Base's Natural Resources.**

The deficiencies of the Draft INRMP are perhaps best reflected by Chapter 1.4, entitled "Natural Resource Management Structure," which purports to describe the different departments that will deal with natural resources planning, monitoring, enforcement, compliance, and management on Camp Pendleton. The structure outlined by Chapter 1.4 is, to put it mildly, Byzantine.

According to the Draft INRMP, the lead agency for coordinating environmental compliance on Camp Pendleton is the Assistance Chief of Staff, Environmental Security ("AC/S ES"). Within the AC/S ES is housed the Natural Resources Department, the Environmental Compliance Department, and the Information Systems Branch. (Draft INRMP at 1-16 - 1-17.) The Natural Resources Department "provides strategic planning for and daily implementation of Natural resource management," while the Environmental Compliance Department "provides strategic planning for and daily implementation of environmental protection and compliance regulations base wide." (Draft INRMP at 1-17.)

These different departments are further subdivided into a complex array of "branches" and "divisions"—the exact function of which is never made clear. Thus, the Natural Resources Department is divided into the Resource Management Division (which is subdivided into the Wildlife Management Branch, the Land Management Branch, the Resources Enforcement Branch, and the Archeological Resources Branch) and the Resource Planning Division (which is subdivided into the Strategic Environmental Planning Branch, the Project Oversight Branch and the NEPA Branch). For its part, the Environmental Compliance Department is divided into the RCRA Division, the Inspection and Compliance Division, and the Environmental Engineering Division.

In addition to this bureaucratic scheme (already complex enough), Chapter 1.4 also discusses the Office of Water Resources, the Public Works Department, the Facilities Maintenance Department, the Real Estate Office, the Range Operations Division, the Operations Division, the Training Resources Management Division, the Community Plans and Liaison Office, the Provost Marshal's Office, the Fire Department, and the Western Regional Environmental Coordinator.

At no point, however, does the Draft INRMP provide an organizational chart that shows precisely how these various offices interact with each other, who the persons in charge of each of these departments are (even by title), or to whom they report. More disturbingly, the Pendleton INRMP does not explain, in the context of specific activities carried out by the Marine Corps, how the Draft INRMP's structure will function to ensure that the Bases' resource management objectives are achieved. Nor does Chapter 1.4 discuss the process by which violations of Base regulations or federal law will be reported and remedied.

F

G

H



Take, for example, a proposed training exercise that has the potential to negatively impact one or more threatened or endangered species located on the base. Who normally proposes such exercises? Which office reviews the proposal for environmental compliance? Who, if anyone, is responsible for requiring mitigation and avoidance measures to be taken? Is there any monitoring of the training exercises for compliance? What office handles that monitoring? How and when are violations of mitigation requirements reported? To what office are they reported? Are data on the environmental effects of the training exercises collected and by whom?

As written, the Draft INRMP does not answer these questions and it certainly does not provide for "integration of, and consistency among, the various activities conducted under the plan," as the Sikes Act requires. 16 U.S.C. § 670(a)(4b)(1)(c). Indeed, the Draft INRMP even lists, as one of its "high priority" planned actions to "[c]learly identify the person accountable for project implementation and mitigation requirements for each project." (Draft INRMP at 4-72.) The fact that this project is listed as "ongoing," points to a deep dysfunctionality in the Marine Corps' management of Camp Pendleton's natural resources. Certainly an effective INRMP cannot be finalized until such a basic organizational project has been completed and incorporated into the plan.

## **II. The INRMP Does Not Provide Sufficient Assurances That Impacts to Threatened Species Will Not Be Significant.**

Another flaw with the Draft INRMP is its treatment of "Threatened and Endangered Species." (Draft INRMP Section 4.5.) As a whole, this section sets forth the steps that the Marines are taking to comply with various biological opinions that have been issued by the United States Fish and Wildlife Service. While assuring compliance with existing law is important, a truly effective natural resources plan must also provide concrete conservation measures, with numerically quantifiable goals. Unfortunately, the Draft INRMP provides few details about the implementation measures it will use to proactively manage Camp Pendleton's biodiversity. Accordingly, Section 4.5—and, indeed, the entire Draft INRMP—reads more like a plan for complying with the Marines' current obligations under a grab-bag of biological opinions issued by the United States Fish and Wildlife Service, rather than an integrated plan for managing the Base's natural resources, as the Sikes Act envisions.

In fact, the "guiding principles" contained within Section 4.5 are often at odds with the entire concept of affirmatively managing the Base to benefit its threatened wildlife and, arguably, even with the more modest goal of simply complying with the law. (Draft INRMP at 4-33). For example, the second guiding principle states "[s]hould populations of threatened or endangered species increase in size and geographic area across the Base, there will not be a concomitant increase in restrictions to training or support activities." (*Id.*) While we agree that Camp Pendleton should not be penalized by good management practices, this "principle" is simply not consistent with the requirements of the Endangered Species Act ("ESA"). 16 U.S.C. §§ 1532, *et seq.* As the Draft INRMP itself acknowledges, the ESA requires the Marines to consult with the Fish

and Wildlife Service if its proposed activities "may effect" any member of a listed species or its designated critical habitat. 50 C.F.R. § 402; Draft INRMP at 4-34. Whether or not those impacts effect a population that has increased in size or geographic scope is simply irrelevant. So long as a species remains protected by the ESA the Marine Corps has a legal duty to consult with the United States Fish and Wildlife Service and, if required by the Service, to restrict training activities accordingly.

Similarly, the third "guiding principle" states that habitat enhancement, restoration, and "other efforts" to mitigate impacts from ongoing base activities "will not further reduce the overall land available to training." (Id.) The Marines cannot, consistent with a biologically sound management plan, predetermine what mitigation will and will not be required. Mitigation is, after all, compensation for impacts to listed species that have *already* occurred as a result of activities on the base. If the Marines do not wish to be forced to undertake such mitigation, it should avoid negatively impacting listed species in the first place. If, however, the Marines Corps chooses to undertake such activities, it must be prepared to mitigate any impacts fully.

Another flaw in the Draft INRMP is its failure to incorporate specific, quantifiable, targets into its plans for individual species. Some notable exceptions to this general rule are the goals set forth in Table 4-1 for the least Bell's vireo (200 territorial males), southwestern willow flycatcher (20 territorial males), and western snowy plover (40 breeding pairs). (Draft INRMP at 4-35.) Adopting such quantifiable measures allows both the Marines and the public to more accurately gauge the Draft INRMP's success.

Thus, instead of setting "maintain existing habitat" as a goal for the arroyo southwestern toad, the Draft INRMP should specify exactly how many acres needs to be maintained in order to sustain a healthy toad population on the Base. Similarly, the Marines should set a population target for the toad that will indicate when a stable population level has been achieved. As with the arroyo toad, the Draft INRMP does not provide such goals for the vast majority of species discussed on the Base.<sup>1</sup>

Similarly, the INRMP's broader management "goals" for endangered and threatened species do not reflect proactive conservation planning. (Draft INRMP at 4-36.) These goals are:

- 1) "Incorporate principles of ecosystem management into threatened and endangered species management;"
- 2) "Maintain existing populations of federally listed species and survey for new populations and existing populations;"
- 3) "Conserve and manage threatened species and endangered species in accordance with all environmental laws and their existing regulations;" and

<sup>1</sup> It is possible, that some other numerical goals exist in the various biological opinions and other documents that are incorporated into the INRMP by reference. If so, those goals must be made more explicit and put within the actual text of the document.

- 4) "Conduct research on the population dynamics of threatened and endangered species in order to make recommendations that assist in their survival and recovery."

Id.

While these goals are important, they are all essentially passive, and seek nothing more than to the status quo. We recommend that the Marines adopt the following goal: "achieve and maintain healthy, stable populations of all threatened and endangered species on the Base." Again, to accomplish that goal, the INRMP must set minimum habitat requirements and population levels *for each listed species*.

### III. The Pendleton Draft INRMP's Mechanisms For Public Assessment Are Grossly Inadequate

Finally, Section 7.8 of the Draft INRMP outlines the process through which the success of the INRMP will be monitored and evaluated. According to the INRMP, the evaluation and update process will consist of semiannual reviews (quarterly), an Annual Review, and a Five-Year Review. (Draft INRMP at 7-28.) Quarterly reviews are apparently limited to Base managers, with the purpose of documenting progress, identifying additional actions required or desired, and revising schedules and priorities. Annual reviews will be conducted with Base leaders as part of an Environmental Impact Review Board meeting. Finally, the Fish and Wildlife Service, and the public, will only be given information about the INRMP every five years, as part of the Five-Year Review.

We believe that, as described, this process is grossly inadequate. First, the INRMP must provide far more detail about the form, substance, and process of these reviews. As it stands, the entire Draft INRMP devotes less than a page to the review process. For example, who will conduct the semiannual, annual and five-year reviews? What will be the standards by which progress is measured? How will the annual review process utilize the information gathered in the semiannual reviews and how will the Five-Year reviews utilize the information gathered in the annual reviews? Who will prepare the reviews? The INRMP does not address any of these questions.

Second, we strongly believe that monitoring and research data gathered by the Marines must be made available to the public and the scientific community. To facilitate this goal, we recommend that as part of the annual review process, the Marines collect the data gathered from monitoring and research conducted during the previous year and make it available to interested parties (along with a summary of findings).

Third, the review process needs to be more transparent and the public needs to be involved at an earlier stage. To that end, the Fish and Wildlife Service should be given copies of not only the Five-Year Review but the semiannual and annual reviews as well. The annual reviews should also be made available to the public and public comment on the INRMP's progress should be solicited.

3

S

Finally, we believe that the Marines should establish an independent advisory group of scientists, regulators, representatives of environmental NGOs, and citizen representatives to review monitoring data, relevant research, and the semiannual reviews, and to make recommendations to the Marines as part of its annual review process.

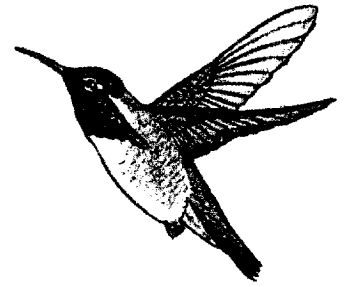
Thank you for considering these comments.

Sincerely,



Andrew E. Wetzler  
Senior Project Attorney

# Klein-Edwards Professional Services



4

July 2, 2001

Commanding General (AC/S Environmental Security)  
Attention: Ken Quigley  
Box 555008  
Marine Corps Base  
Camp Pendleton, CA 92055-5008

Subject: Comments to the Integrated Natural Resource Management Plan (INRMP)

Mr. Quigley,

Klein-Edwards Professional Services (KEPS) herein submits its comments for the above mentioned Plan. You spoke to me about two weeks ago related to the San Diego Audubon Society. After attempting to coordinate with them (I am their Land Use Conservation Chair), we were unable to get all of the aspects of the Plan reviewed and commented on. Therefore, KEPS will submit its comments independent of the San Diego Audubon Society.

First of all we wish to complement the Marine Corps for completing a very comprehensive Draft of the INRMP. We recognize the difficulty in balancing the mission of the Marine Corps and Camp Pendleton with regards to national readiness and natural resources management for the region. Reconciling the two is not always going to be in the best interest of either party.

Let me introduce our company so that you have a better appreciation of our qualifications to comment on this Plan. We are a biology-consulting firm in southern California with two principals, Claude G. Edwards and Michael W. Klein. Mr. Edwards has strengths with birds, plants and habitats. Mr. Klein has strengths with insects with an emphasis on butterflies and pollinators, birds, and habitats. Our comments will be based on the experiences mentioned.

In Paragraph 1.1.5 quarterly and annual reviews are mentioned. Will they be open for public review and comment?

A

In Chapter 4 – Natural Resources Management, there is a strong position maintain biological diversity especially within plant communities but no where is there management specifics related to pollinators to provide that plant diversity. It must be emphasized that native plant sustainability is useless without native pollinators and managing habitats for those species.

B

Paragraph 4.2 deals with natural resources inventory. We commend and support this effort but wish to make the following correction to Appendix G – Wildlife species:

Under Class Aves it is recommended that the Origin column include a migrant label along with native and non-native. That being the case, the following should have migrant label; Sharp-shinned Hawk, Zone-tailed Hawk, Rough-legged Hawk, Ferruginous Hawk, Swainson's Hawk, Rhinoceros Auklet, Common Murre, Northern Pintail, American Wigeon, Northern Shoveler, Green-winged Teal, Blue-winged Teal, Eurasian Wigeon, Gadwall, Greater White-fronted Goose, Lesser Scaup, Ring-necked Duck, Greater Scaup, Canvasback, Brant, Canada Goose, Bufflehead, Common Goldeneye, Snow Goose, Ross's Goose, Oldsquaw (Long-tailed Duck), Tundra Swan, White-winged Scoter, Surf Scoter, Common Merganser, Red-breasted Merganser, Chimney Swift, Vaux's Swift, Cedar Waxwing, Blue Grosbeak, Black-headed Grosbeak, Lesser Golden Plover, Western Yellow-billed Cuckoo, Grasshopper Sparrow, Lark Bunting, Chestnut-collared Longspur, Swamp Sparrow, Lincoln's Sparrow, Fox Sparrow, Lazuli Bunting, Green-tailed Towhee, Vesper Sparrow, Dickcissel, Brewer's Sparrow, Chipping Sparrow, White-Throated Sparrow, Golden-crowned Sparrow, White-crowned Sparrow, Merlin, Prairie Falcon, Magnificent Frigatebird, Arctic Loon, Common Loon, Pacific Loon, Red-throated Loon, Barn Swallow, Cliff Swallow, Purple Martin, Bank Swallow, Northern Rough-winged Swallow, Tree Swallow, Violet-green Swallow, Hooded Oriole, Northern Oriole, Black Tern, Herring Gull, Mew Gull, Ring-billed Gull, Glaucous-winged Gull, Yellow-footed Gull, Little Gull, Bonaparte's Gull, Thayer's Gull, Black-legged Kittiwake, Parasitic Jaeger, California Least Tern, Elegant Tern, Common Tern, Royal Tern, Arctic Tern, American Pipit, Yellow-rumped Warbler, Black-throated Gray Warbler, Hermit Warbler, Palm Warbler, Chestnut-sided Warbler, Yellow Warbler, Blackpoll Warbler, Townsend's Warbler, Yellow-breasted Chat, Black-and-White Warbler, MacGillivray's Warbler, Northern Waterthrush, American redstart, Lucy's Warbler, Tennessee Warbler, Nashville Warbler, Wilson's Warbler, Lewis' Woodpecker, Red-naped Sapsucker, Northern Fulmar, Black Storm-petrel, Sooty Shearwater, Ruby-crowned Kinglet, Golden-crowned Kinglet, Baird's Sandpiper, Stilt Sandpiper, Pectoral Sandpiper, Red Phalarope, Red-necked Phalarope, Wilson's Phalarope, Spotted Redshank, Western Tanager, Summer Tanager, Roseate Spoonbill, White-faced Ibis, Black-chinned Hummingbird, Broad-billed Hummingbird, Rufous Hummingbird, Allen's Hummingbird, Winter Wren, Swainson's Thrush, Varied Thrush, Olive-sided Flycatcher, western Wood-Pee-wee, Pacific Slope Flycatcher, Hammond's Flycatcher, Dusky Flycatcher, Southwestern Willow Flycatcher, Gray Flycatcher, Ash-throated Flycatcher, Rose-throated Becard, Vermillion Flycatcher, Eastern Phoebe, Western Kingbird, Least Bell's Vireo, Cassin's Vireo, Warbling Vireo, White-eyed Vireo, Gray Vireo.

In addition to changing these to migrants, it is recommended to note summer breeding or winter. This changes management of the lands. For example, since Least Bell's Vireo is a summer breeding bird, training exercises are not off limits in the winter months.

Change Brown-headed Cowbird from exotic to native. These birds came across the mountains on their own and are not considered introduced. Common Snipe is in there twice, please remove one of them.

With the Insecta Class, effort should be made to at least have genus if common names are given. The following are corrections to the Insecta Class:

*Okanagana vanduzeei* – Vanduzee's Cicada

Bernardino Blue change to *Euphilotes battoides bernardino* (Lycaenidae)

*Leptotes Marina* – Marine Blue

Drop *Philotes battoides* – the only battiodes in San Diego or Orange County is bernardino (noted above)

*Autographa californica* – Alfalfa Looper

*Peridroma saucia* – Variegated Cutworm

*Pseudaletia unipuncta* – Armyworm

*Trichoplusia ni* – Cabbage Looper

*Xylomyges curialis* – Early Spring Miller

Change Origin of the cabbage Butterfly *Pieris rapae* to exotic. This is introduced from Europe.

*Caliphelis nemesis* – Fatal Metalmark

Remove California Ringlet Nymphalidae from and the list and put it with the Family Satyridae. The California Ringlet is a satyr.

G  
(cont.)

Within the order Lepidoptera, we are surprised that more butterflies are not observed. Especially ones such as the Western Tiger Swallowtail, Red Admiral and Mourning Cloak. These butterflies will become very important wetland indicators since they are found around there. Two other skippers not mentioned and efforts should be made to survey for them are the Wandering Skipper (*Panoquin errans*) and Harbison Dun Skipper (*Euphyes vestris harbisoni*). The Wandering Skipper was a petitioned species with the Fish and Wildlife Service a few years back but not listed due to unknown biology. The Dun Skipper was also a candidate for listing and the Service concluded the same as with the Wandering Skipper. The Dun Skipper has a stable population in Silverado Canyon in Orange County, a small population in Escondido and the major populations east of the I-15 corridor down to the border. It appears to have a northwest to southeast population distributions and therefore should be one that should be surveyed for on Camp Pendleton. Both skippers are wetland species and therefore should part of the Species Specific monitoring and mapping plan.

H

Three other invertebrates that should be incorporated into the Wetlands monitoring plan are the Sandy Beach Tiger Beetle (*Cincidela hirticollis gravida*), Oblivious Tiger Beetle (*Cincindela latesignata oblivious*) and the Globose Dune Beetle (*Coelus globosus*). These are important to wetland ecology as predators and very little is known about them. They are also visible species in the north county MHCP and therefore should be considered the same for Camp Pendleton.

I

As was mentioned earlier, a large part of habitat restoration that is not included is pollinator management. It is well understood that most plants require some form of assistance in the reproductive cycle. That assistance can come in the form of wind, birds, bats or insects. It is also well known that insects play a major role in the pollination aspect. Since little is known about the insect fauna in our region it goes without saying the regional pollination knowledge is also not well known. Since the San Diego Region has a very specialized flora compendium, it would make sense the pollination would also be specialized. Managing for this would then become one of the High Priorities. But before someone can manage something research needs to be done first. It is recommended that the Federally protected plants and the high category listed plants under the CNPS guidelines be mapped and surveyed for the potential pollinator. Once established then incorporate this new information into the management of the plants. Remember plants do not make it to the seed dispersal phase until pollination has taken place.

J

Paragraph 4.6.2 Exotic Animals. Although Brown-headed Cowbirds are a threat to the recovery of the Least Bell's Vireo, it is not really considered and exotic. This bird did move over the Rocky Mountains on its own and established itself here. But it was not introduced. We do agree though that management for these birds are important for the Vireo's survival and hopeful recovery.

K

Also, we recommend including the European honeybee into the list of exotics because of its aggressive nature and ability to out compete native pollinators. We also recommend that the Argentine Ant be elevated to a current status for controlling because it has been shown to cause problems with Least Bell's vireo nests as well as possibly being a factor in Quino Checkerspot Butterfly declines.

L

M

If you have further questions or request clarification to these comments, I can be reached at 619/282-8687.

Respectfully Submitted



Michael W. Klein Sr.  
Principal / Biologist





Orange Coast District  
2030 Avenida del Presidente  
San Clemente CA 92672  
(949) 492-0802

07-16-01 A09:35 IN

5

June 28, 2001

Christopher M. White, Ph.D.  
Division Head, Resource Management  
AC/S, Environmental Security  
Marine Corps Base (Bldg. 22165)  
Box 55508  
Camp Pendleton CA 92055-5008

Dear Dr. White,

The Orange Coast District of the Department of Parks and Recreation would like to thank you for the opportunity to review the Draft Final Integrated Natural Resources Management Plan for Marine Corps Base and Marine Corps Air Station Camp Pendleton. As lessee of over 2000 acres of Camp Pendleton, San Onofre State Beach, we not only share land uses, but also many natural resource values. Our observations are as follows:

This Management Plan will be a useful tool for future planning efforts and operations on Base. We trust that it will aid your internal communications and appreciation of natural resource values while fulfilling your training mission. Utilizing finer scale GIS mapping, cultural resource data and the Management Plan, informed resource decision making will be enhanced. It will be a useful resource for our planning efforts at San Onofre State Beach.

Exotic plant species control efforts as well as partnering with other agencies and organizations in these efforts is applauded. The Department has enjoyed past collaborations on various species, in various locations and feel that continuing efforts on control will further our shared goal of managing quality ecosystems.

We also applaud the Base's acknowledgment and participation in regional resource planning efforts that surround the Base. Understanding the connections to bordering open spaces helps all parties know how they can manage their land to the benefit of all species.

The reference section in this plan lists many focused studies completed on Base resources, some of which would be a welcomed addition to the park's understanding of population and species activities in or near park lease land. We will request titles in

A

Christopher M. White, Ph.D.  
June 26, 2001  
Page 2


another correspondence. There is one reference that does not show up on your list that lends a depth of understanding to the San Onofre State Beach "Coastal" watershed, showing the onset and chronology of gully and bluff failure development that is particularly relevant to the Department. The citation is Kuhn, G. L. 1998-1999. Geological Assessment: 1997-1998 Sea Cliff, Canyon, and Coastal Terrace Erosion: San Onofre State Beach and Camp Pendleton Marine Corps Base, San Diego County, California. Unpublished report by the International Foundation For Applied Research in the Natural Sciences for MCB Camp Pendleton and Department of Parks and Recreation.

B

As the Management Plan lists, the Department has several ongoing resource, recreation and public access activities that are a part of Base activities. Our goals are common to the stated ecosystem management goals, and we are in "mutual agreement" with the management plans in the document. We expect to participate in ongoing reviews and updates planned for this document, share our resource measures and activities with you, and look forward to a continuing positive relationship on these topics and others as time passes.

If you have any questions regarding these observations, please feel free to call me or David Pryor, Resource Ecologist at (949) 497-1421.

Sincerely,

  
Michael M. Tope  
District Superintendent

## DEPARTMENT OF PARKS AND RECREATION

Orange Coast District  
3030 Avenida del Presidente  
San Clemente CA 92672  
(949) 492-0802

07-16-01 A09:38 IN



6

June 29, 2001

Christopher M. White, Ph.D.  
Division Head, Resource Management  
AC/S, Environmental Security  
Marine Corps Base (Bldg. 22265)  
Box 55508  
Camp Pendleton CA 92055-5008

Dear Dr. White,

On review of the Draft Final Integrated Natural Resources Management Plan for Marine Corps Base and Marine Corps Air Station Camp Pendleton, we are reminded of two topics that affect the resources we manage at San Onofre State Beach and the potential impacts to future planning efforts.

We suggest a careful review of potential significant natural resource impacts when considering lease renewal in 2003 of row crops in the San Mateo area. As we gain a better understand of our lease and nearby lands, we understand there may be potential impacts to arroyo toads, steelhead trout, and tidewater gobys due to production practices. Direct and indirect impacts to these species may occur due to aquifer draw down for irrigation, tilling and pest control. Downstream sedimentation, water quality, and wildlife crossing issues have also been brought up to the Department regarding these species.

A

Because of the physical nature of the 50 year lease for San Onofre State Beach and the Base's benefit of its use as a buffer area between the City of San Clemente, we understand that there are mitigation areas assigned within our lease land. We have not seen documents nor mapping of these assignments if they exist. Could you confirm their existence, locations and acreage as this may impact our long-term strategies for planning and land use management?

B

We appreciate your cooperation regarding these resource issues and look forward to sitting down with you in the future and discussing these and other topics common to our shared property.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Tope'.

Michael M. Tope  
District Superintendent

[This Page Intentionally Left Blank.]

**RESPONSE TO COMMENTS**  
**on the**  
**MCB and MCAS Camp Pendleton Integrated Natural Resources Management**  
**Plan (Public Review Draft, May 2001)**

**Letter 1     Rebecca Lent, Regional Administrator, United States Department of Commerce, National Oceanic and Atmospheric Administration, National Marine Fisheries, Service**

1-A            Surface water monitoring was conducted quarterly from 1997 to 2000, although testing for pesticides was not conducted. Groundwater monitoring is scheduled to continue in the San Mateo Creek.

As stated within the INRMP, many watershed issues require Camp Pendleton to participate in cooperative planning and management efforts. These issues include water supply, water quality, wastewater management, aquatic habitat protection, flood protection and floodplain management. To address these issues effectively, the Base is attempting to coordinate with surrounding jurisdictions during infrastructure and land use development planning and approval process. Camp Pendleton has taken a leadership role within the Santa Margarita River watershed in promoting a watershed approach, and the Base intends to take a similar approach in the San Mateo Creek watershed, as urbanization increases. While no current management actions have been planned for the San Mateo watershed at this point, the Base anticipates the development of a Biological Assessment for the steelhead and expects to consult with your agency [NMFS] and the USFWS on the management of this species. Moreover, specific management actions are also expected to be the topic of discussions with your agency, the USFWS, the California Department of Fish and Game, the State of California Department of Parks and Recreation, and the Cleveland National Forest during the development of a management program for the San Mateo watershed.

1-B            See response 1-A.

1-C            See response 1-A.

1-D            See response 1-A.

1-E            Camp Pendleton is currently working with the Cleveland National Forest and California Department of Fish and Game regarding coordinated efforts in controlling exotics in the San Mateo watershed. Camp Pendleton plans on including specific actions to address these issues as part of developing management programs and ESA consultations for the steelhead in cooperation with your agency and the Cleveland National Forest. Specific actions will be developed as part of Section 4.6 (Exotic Invasive Species Control).

1-F See response 1-A.

**Letter 2 Valarie McFall, Senior Environmental Analyst, Transportation Corridor Agencies**

2-A Comment noted. Camp Pendleton believes that the asphalt, fencing, and vehicular traffic on the I-5 and the few underpass opportunities below the highway present a substantial constraint to wildlife movement. In addition, the highway underpasses at the creeks are not as wide as the associated riparian vegetation corridor and, in the case of the San Mateo Creek, the agricultural fields, beach access roads, and other development also restrict wildlife movement.

2-B Changes have been made to the text, deleting the words “electric transmission lines” from the parentheses. Camp Pendleton believes that transmission lines pose a substantial electrocution risk to local wildlife species, particularly raptors. And, while wildlife can and do use the easiest routes possible when moving locally from one site to another, local movement may be constrained by the location, height, and mere placement (presence) of transmission lines and their use as a potential perch site for predators.

2-C Copies of the Camp Pendleton Listed Upland Species Management Plan will be available on the Base’s Web site when the Uplands Biological Opinion that covers it is completed.

2-D Table 3-8 of the INRMP has been updated (for 1995) to reflect this information, as identified in the Final Natural Environmental Study produced in January 1998.

2-E The reference to the “last ten years” within the sentence has been removed. Regional population growth and proposed transportation routes on Camp Pendleton has continued to be an issue for the Base for over 30 years.

2-F See Copies of these reports are available for photocopying at Camp Pendleton. Scheduling a time for someone to photocopy the reports can be coordinated with the INRMP coordinator within the Planning Branch within the Natural Resources Department

2-G See response 2-C.

2-H Copies of the Camp Pendleton’s Environmental Guidebook are available to all interested parties at the Environmental Security (ES) office, building 22165. A copy has been forwarded to TCA.

2-I Copies of this material have been provided to TCA.

- 2-J The INRMP text regarding the Migratory Bird Treaty Act has been revised.
- 2-K Camp Pendleton is currently in consultation with the USFWS on the *Biological Assessment of Upland Habitats* (March 2000). Upon completion of ESA Section 7 consultation with the USFWS, and finalization of their Biological Opinion (issued by the USFWS), a copy of the BO and BA (if not included within the BO) will be made available for photocopying by interested parties. It is the Base's position that, until the consultation with the USFWS is complete, the BA is a pre-decisional document not available to outside agencies or the public.
- 2-L The INRMP text was modified to reflect typical restrictions.

**Letter 3     Andrew E. Wetzler, Senior Project Attorney, Natural Resources Defense Council**

- 3-A Chapters 4 and 5 of the INRMP provide the public with specific programs that list actions that the Base has committed to accomplishing and the year of completion. These Priority Planned Actions represent a significant commitment on the part of the Base to ensure proper conservation and management of its natural resources. Where possible and desirable, the Base has tried to be specific in the language of the planned actions. It is not possible to be more specific with some planned action because they are still being drafted or depend on results of other, earlier actions. It is also not desirable to be more specific with some planned actions to allow the flexibility necessary for adaptive management.
- 3-B The lead organization on Base for coordinating environmental issues, be they compliance, stewardship or enforcement, is the Assistant Chief of Staff, Environmental Security (AC/S ES). The section regarding organization and responsibilities for natural resource management has been revised; much of the details of each organization were placed in an appendix. Two organizational charts have been developed and added to the INRMP.
- 3-C All steps taken to avoid and minimize impacts to federally listed threatened and endangered species are directed by the terms and conditions of various BOs issued to the Base by the USFWS. Compliance with terms and conditions are non-discretionary. All activities and actions proposed within the INRMP that "may affect" a federally listed threatened or endangered species are either required as a term or condition of a BO, are covered by an existing BO, or are part of an ongoing consultation. As additional actions are developed and proposed through the review process, they will be evaluated in accordance with the activity class system (per the Estuarine and Beach Conservation Plans and, when finalized, the Uplands Biological Opinion).

- 3-D The public participation/comment requirements of Section 2905(d) of the SAIA (“provide an opportunity for the submission of public comments on integrated natural resources management plans proposed under subsection 2905(c)(1)”) was accomplished by placing copies of this INRMP at libraries in San Clemente, Oceanside, and Fallbrook and on the Base’s website during a formal review period (18 May to 2 July 2001). Notifications of the availability of the INRMP and the public review and comment period were made by letter, mailed to over 65 individuals and organizations, and by published notices in the Orange County Register, North County Times, and the San Diego Union-Tribune. Future updates to the INRMP will provide additional public comment opportunities, as identified in Section 1.2.1 of the INRMP.
- 3-E It is Camp Pendleton’s position that the Base is in compliance with the requirements of federal law and provides meaningful protection for natural resources on the installation. Camp Pendleton has consulted, and continues to consult, with the USFWS on the development of management plans for federally listed threatened and endangered species on Base and for projects that may have an effect on those species. The USFWS has issued the programmatic Biological Opinion (1-6-95-F-02) to address ongoing Base activities and conservation plans in riparian and estuarine/beach ecosystems to assure the listed species within these habitats on Base are not jeopardized. A programmatic Biological Opinion for the coverage of listed species within upland habitats is currently in consultation and is expected in 2002. The Base will continue to consult with the USFWS on a project-by-project basis in accordance with the activity and consultation class systems established within these plans.
- Beyond compliance with Biological Opinions, it is important to note that Camp Pendleton has been a stronghold for many of the region’s declining species, including federally listed species, and habitats for over 30 years. Many of these species, and much of their associated habitats, have all but disappeared in the region and in areas immediately surrounding the Base (e.g., Pacific pocket mouse, tidewater goby, arroyo toad, vernal pools and fairy shrimp, etc.). To state that Camp Pendleton’s conservation and management efforts, identified in many locations within the INRMP, do not provide “meaningful protection,” fails to recognize or even acknowledge the Base’s ongoing commitment to natural resource management and underestimates the value of the Base’s suite of resources to regional conservation planning efforts.
- 3-F See response 3-B.
- 3-G The Draft INRMP’s structure, in and of itself, will not “ensure the Base’s resource management objectives are achieved.” Camp Pendleton, however, does view the INRMP as a process and program, not a product (document). The semiannual INRMP reviews (including more formal reviews every five years), which are presented in Chapter 1, are key to this process. These reviews provide



a venue for evaluation, discussions of adaptive management, presentation of ideas for improvement, and assessment of progress towards goals and objectives with Base staff and resource agencies. Furthermore, each planned action has one or more sponsoring agencies within the Base. These sponsors are responsible for the planning, budgeting, implementation, and tracking of actions. Monitoring success of the plan is also part of the Marine Corps Environmental Compliance and Evaluation program, the Self-Audit Program, and the Annual Plan of Action and Milestones, all discussed in the INRMP.

3-H The INRMP provides a section on enforcement. In the Public Review Draft (May 2001), enforcement was presented in Chapter 7, but this section has been moved to Chapter 4 of the current INRMP. Camp Pendleton has established and is in the process of implementing an Environmental Incident Reporting System to track and monitor compliance with established Base regulations, mitigation requirements, and general environmental compliance. Also involved in identifying, monitoring and tracking compliance issues and providing enforcement capabilities are Base Game Wardens, the Fire Department, and the Provost Marshall's office.

3-I All training operations are scheduled and cleared through the Range Operations Division, Range Control. Routine training exercises are allowed to proceed as long as they are conducted in full compliance with the Range and Training Regulations (which have been reviewed by the AC/S Environmental Security). Activities that are beyond what has been approved as routine or that may affect sensitive resources (as identified in the Range and Training Regulations or the Environmental Operations Map, which is produced and distributed semiannually by the AC/S Environmental Security) require approval from AC/S Environmental Security or review in accordance with the NEPA and Base regulations. The Resource Planning Division within the Natural Resources Department performs NEPA reviews. As part of this NEPA review compliance with the ESA and CWA is reviewed and includes determination if avoidance and minimization can be achieved and/or what permits and mitigation are required.

The Environmental Security office has developed, and is in the process of implementing, an Environmental Incident Reporting System for the documentation and tracking of all environmental incidents (including non-compliance with terms and conditions). To improve existing tracking and monitoring of NEPA projects, mitigation, and compliance with terms and conditions, the Base is in the process of developing a computer based NEPA project tracking program (E-Trax) and a mitigation database. The first phase of development of this new, integrated E-Trax system has been completed and is beginning to be utilized. Completion of the second phase, which integrates the mitigation tracking element, is contingent upon funding availability.

Lastly, the Long Term Trend Monitoring program presented in the Natural Resources Inventory section of Chapter 4 is intended to gather data that will help evaluate long term environmental effects of ongoing training.

- 3-J The INRMP review process (also included in response 3-G) not only helps assure that the management actions are achieved, but provides for an evaluation of the integration of, and consistency among, the planned actions. Areas that are identified as not well integrated will be appropriately addressed (e.g., some planned actions may be added to the INRMP as a result of this process). As presented within the INRMP, there are existing mechanisms (e.g., programmatic instructions, NEPA process) that help ensure the integration of land management with land use.

The word “new” was added to the Priority Planned Action for clarification. It now reads: “Clearly identify the person accountable for project implementation and mitigation requirements for each new project.” This Priority Planned Action was included in the INRMP because it is a key requirement for NEPA review and implementation for each new project that is reviewed under NEPA and must not be forgotten, especially in light of the number of NEPA reviews conducted for projects that are not sponsored by DoD.

- 3-K Section 4.5 of the INRMP, entitled *Threatened and Endangered Species Management*, was not written to address overall biodiversity management. Section 4.5 addresses the means by which the Base is managing (*must manage*) its suite of federally listed species and associated habitats, according to terms and conditions set forth within Biological Opinions issued by the USFWS. These BOs, and the terms and conditions they contain, ensure that, when implemented, significant effects to federally listed species on Base are avoided. Compliance with BO terms and conditions identified within Biological Opinions is nondiscretionary.

Camp Pendleton agrees that numerically quantifiable goals (or objectives) are an important component of good natural resource management and stewardship principals. Numerically quantifiable goals were identified within the Base’s programmatic Riparian and Estuarine/Beach Conservation Plan for a number of riparian, beach, and estuarine species. That plan was approved and signed by the USFWS in 1995 as a result of formal consultation under Section 7 of the ESA. At present, Camp Pendleton is in formal consultation with the USFWS on its federally listed upland species and associated habitats. It is anticipated that, upon completion of the consultation over the *Biological Assessment of Uplands Habitats* (for the management of federally listed upland species), that numerically quantifiable goals will be incorporated as part of the Biological Opinion issued by the USFWS.

- 3-L Camp Pendleton manages its suite of natural resources in a manner consistent with the existing federal laws, and both DoD and Marine Corps guidance. However, it should be noted that Camp Pendleton, as a military installation was

set aside specifically for military readiness and training, therefore the Base does not manage its natural resources to solely benefit its sensitive plant and wildlife species and habitats. Camp Pendleton manages its natural resources toward its primary purpose: achieving its military training mission. As such, the Base has established, through Section 7 consultation with the USFWS, a programmatic management approach for listed species within riparian, beach, and estuarine habitats. (The Base is currently in consultation with the USFWS for the development of a programmatic management approach for the listed species in upland habitats.) Such a programmatic approach allows for the necessary flexibility for the continuance of training while ensuring compliance with ESA. Activities that may affect federally listed species and that are not covered under either of these programmatic management plans still require consultation with the USFWS. Activity/consultation class systems defined within these plans help identify the level of consultation required.

3-M Camp Pendleton, as well as the Marine Corps, does not “predetermine” mitigation. Appropriate measures to off-set the potential impacts to federally listed threatened and endangered species and designated critical habitat resulting from Base activities is determined in concert (and in consultation) with the USFWS. Also, it has been and will continue to be the policy of this installation to *avoid and minimize* impacts whenever feasible. It has been the Base’s policy when negotiating reasonable and prudent measures with the USFWS to pursue alternatives that have ecosystem benefits and do not establish preserves.

3-N See response 3-K regarding “numerically quantifiable goals...”

3-O Proactive conservation management is reflected in the goals, objectives, and numerous planned actions that have been developed for stewardship purposes and are not specifically driven by legal compliance. One important example is the Base’s movement toward an ecosystem based natural resources management approach. This shift is reflected in part by the signing and implementation of the 1995 programmatic Riparian and Estuarine/Beach Conservation Plans with their habitat based, landscape-scale approach. Additional planned actions, including regional partnering to develop a shared vision of desirable future ecosystem conditions, also reflect this move towards a more proactive, ecosystem-based approach.

Habitat goals and population were set, where appropriate, in consultation with the USFWS, in the Riparian and Estuarine Programmatic Conservation Biological Opinion (1-6-95-F-02) and are expected to be developed, where appropriate, in the programmatic Biological Opinion for the coverage of listed species within upland habitats that is currently in consultation.

Lastly, the Base’s approach to the INRMP is itself proactive: the INRMP is viewed as a process, not just a product. Camp Pendleton will continuously augment and revise the INRMP, rather than wait until the fifth year to complete

such a task. In this way, the Base will proactively manage data and actions to the benefit of the resource and military mission needs.

- 3-P Information on the development and review process has been revised and consolidated into Section 1.2 (INRMP Development, Coordination, Evaluation and Updates). Additional information regarding the review process that was developed as a result of coordination with the USFWS and CDFG has been included.

Camp Pendleton will continuously augment and revise its INRMP, rather than wait until every fifth year to complete such a task. In this way, the Base will proactively manage its data and actions to the benefit of both the resource and military mission needs. The Planning Branch is the Natural Resource Department lead for conducting the semiannual reviews and the INRMP liaison with the wildlife agencies. As described within the INRMP, Camp Pendleton will review, revise, and update the INRMP on a semiannual basis or as significant new information is made available or becomes known. The purpose of the semiannual reviews is to (1) accommodate changes in the military mission and natural resource management objectives, (2) incorporate lessons learned from Base projects, regional activities, or scientific studies, (3) incorporate agreements with regulatory agencies, and (4) ensure the continued usefulness of this plan.

Both internal meetings and communication among natural resource managers on Base and informal communication with USFWS and CDFG are expected to be an ongoing part of the INRMP implementation. Semiannual reviews will provide more formal opportunity for USFWS and CDFG involvement.

Findings from the semiannual reviews will be presented as part of an Environmental Impact Review Board meeting to update senior Base leaders of the status and effectiveness of the plan.

The formal Headquarters, Marine Corps Environmental Compliance Evaluation (ECE) Program will also assess the implementation of the INRMP. The ECE requires an onsite evaluation every three years by an independent team established by Headquarters Marine Corps, an annual review and validation of a Plan of Action and Milestones (POA&M) that follows up formally on any deficiencies identified during the Headquarters Marine Corps ECE, and an annual Self-Audit Program.

Information from the review process will be used to make more informed natural resource management decisions. New information and INRMP updated material will be made available basewide (to military trainers and operators, facilities maintenance staff and project proponents), to regulatory agencies, and the general public through updates to the INRMP posted on Camp Pendleton's website, consistent with the public review process used initially for the draft Final INRMP.

3-Q Such information is already made available to the public and has been used by other agencies and organizations. Reports generated through such efforts are reviewed and approved by Base staff, with new information incorporated into existing management activities and decisions, as appropriate. Copies of reports containing new survey information, once finalized, are provided to the USFWS and are available for photocopying from Camp Pendleton, upon request (see response 2-F). Maps and tables provided in the INRMP will be kept current as data are received.

3-R See responses 3-D and 3-P.

3-S Currently, Camp Pendleton awards contracts for monitoring and research to qualified professionals. Natural resource managers on Base review and approve the methodology and approach to these projects and, where desirable, may seek input from additional professionals in the field. Such decisions are made on a case-by-case basis. Monitoring data and relevant research is available for any organization or individual to review and provide comments and recommendations at any time. The INRMP and future revisions to the INRMP will be available (for review and comment) to members of the public on the Base's web site.

**Letter 4 Michael W. Klein, Sr., Principal/Biologist, Klein-Edwards Professional Services**

4-A Camp Pendleton's Final INRMP will be posted and maintained on the Camp Pendleton web site for public review and comment. Changes will be posted to the web site as they are developed and identified for ease of review by interested parties. The web site will provide interested members of the public information on how and where to submit their comments. No specific deadlines are anticipated to be established so members of the public will have the opportunity to submit comments at any time. Comments received will be reviewed during the semiannual reviews.

4-B Camp Pendleton natural resource managers understand the potential importance of native pollinators as integral components of sustainable ecosystems and appreciate the reviewer's comment. While the Base does not have a management program specifically focused on these species, their importance will be considered during the review of vegetation management, restoration efforts, and other initiatives that may have a potential impact (e.g., pest management, exotics control).

4-C The table will be reviewed by natural resource managers as part of planned efforts for migratory bird management. Potential inclusion of information concerning avian migratory behavior will be considered for future revisions of the INRMP.

- 4-D See response 4-C.
- 4-E Comment noted. However, Camp Pendleton biologists have noted that this species followed the settlement of the West by Europeans and their cattle. In accordance with Executive Order 13112, brown-headed cowbirds are not considered a “native species” by definition in that they did not historically occur within the southern Californian ecosystem. Moreover, as is common with other exotic (nonnative) species that have been introduced into an environment within which they did not evolve, brown-headed cowbirds have no apparent natural enemies or other factors to limit their reproduction and spread within this ecosystem and pose a threat to numerous native avifauna. This said, the Base acknowledges that classification of brown-headed cowbirds as native versus nonnative is arguable. However, for management purposes the Base considers the brown-headed cowbird to be nonnative (exotic) and will continue trapping efforts as part of a commitment to good stewardship and per the Riparian and Estuarine Biological Opinion.
- 4-F Duplications in the appendix have been removed.
- 4-G Recommended corrections to the Class Insecta have been made within the table. Genera and species names will be reviewed by natural resource managers and wildlife biologists for potential inclusion in future revisions of the INRMP.
- 4-H Camp Pendleton natural resource managers appreciate the suggested focus on the recommended species. Such recommendations will be taken into account as part of the Base’s inventory program, specifically during the implementation of the following planned actions:
- Priority Planned Action:*
- Develop a monitoring program for wildlife species of regional concern with a specific focus on those species likely to become proposed for listing as threatened or endangered in the near future. 2002.
- Other Planned Action:*
- Develop an inventory program for wildlife species of regional concern with a specific focus on those species on the Base likely to become proposed for federal listing as threatened or endangered in the near future.
- 4-I Comment noted. The information will be reviewed by natural resource managers and wildlife biologists for potential inclusion of this suggested revision, as funding permits, during the update process in the future.

- 4-J Comment noted. The information will be reviewed by natural resource managers and wildlife biologists for potential inclusion of this suggested revision, as funding permits, during the update process in the future.
- 4-K See response 4-E.
- 4-L The table has been corrected to reflect this change.
- 4-M Inclusion of the Argentine ant into the exotics control program will be reviewed by natural resource managers and wildlife biologists.

**Letter 5 Michael M. Tope, District Superintendent, State of California, The Resources Agency, Department of Parks and Recreation (first letter)**

- 5-A Survey reports and potentially other references cited within the INRMP are available for photocopying at Camp Pendleton. To schedule a time for making photocopies, contact the INRMP coordinator within the Planning Branch of the Natural Resources Department.
- 5-B Reference to the Kuhn (1999) study has been incorporated into the text of Chapter 4.

**Letter 6 Michael M. Tope, District Superintendent, State of California, The Resources Agency, Department of Parks and Recreation (second letter)**

- 6-A Camp Pendleton will take into advisement the consideration of potential impacts of row crops to federally listed species within the San Mateo area prior to lease renewals. The AC/S Environmental Security reviews all lease agreements prior to their issuance and renewal for potential impacts to federally listed species and other environmental concerns.
- 6-B Pursuant to ACOE Permit # 96-20034, Camp Pendleton initiated mitigation (*Arundo* removal as habitat enhancement) within the San Mateo Creek (on State Park leased lands) in 1996, in response to realignment (e.g., of personnel, aircraft, and equipment) to MCB and MCAS Camp Pendleton in accordance with the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510). Also, Camp Pendleton recently initiated additional *Arundo* removal within the San Mateo Creek immediately west of I-5, as part of its ongoing stewardship efforts. The removal of *Arundo*, even as mitigation, does not change conditions of the State Park lease; no restrictions to the use of this land have been added as a result of this activity. A copy of the map of the area treated for *Arundo* removal on the State Park has been forwarded to the Department of Parks and Recreation.

[This Page Intentionally Left Blank.]